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June 20, 2025

Via ECF

The Honorable Valerie E. Caproni
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Re: *United States v. Ciminelli*, No. 16-CR-776-VEC-6

Dear Judge Caproni:

I write on behalf of defendant Louis Ciminelli to request that the Court approve international travel for Mr. Ciminelli. Mr. Ciminelli seeks to travel abroad from July 12 to July 23, 2025, flying to Luxembourg, visiting a friend nearby in Germany, then flying to Florence, Italy, visiting a relative in that area, and then visiting the Maremma region. A complete proposed itinerary has been provided to Mr. Ciminelli's supervising Probation Officer, and to the Assistant United States Attorneys. The Probation Officer will have all final travel details once booked, if the travel is approved by the Court. The travel is proposed for July because it was the only time until the fall that the trip could occur in light of existing commitments. Mr. Ciminelli has been in full compliance with his release conditions since this case began.

The Court's release conditions permit international travel so long as it is "authorized by Probation and consent of the U.S. Attorney's Office for the Southern District of New York." (Dkt. 1071.) Mr. Ciminelli's supervising Probation Officer approved the proposed travel. The U.S. Attorney's Office advised me that "[t]he Government takes no position on this request."

We ask for the Court's approval for two reasons. First, since the U.S. Attorney's Office takes no position on the proposed travel, we ask the Court to approve the travel. Second, the proposed travel encompasses July 17, which, subject to further order of the Court – the parties are filing a joint status letter today as directed by Dkt. 1079 – is the next scheduled status conference in this matter. If the July 17 status conference remains as scheduled, we respectfully request that the Court permit Mr. Ciminelli to travel and to authorize his appearance to be waived for the status conference.

Thank you for the Court's consideration of this request.

Respectfully yours,

/s/Timothy W. Hoover

Timothy W. Hoover

TWH/
 cc: Counsel of record (via ECF)

Application GRANTED. Mr. Ciminelli must provide probation with a full itinerary including addresses and contact numbers for the places he will be staying on his trip.

SO ORDERED. 6/23/25

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE